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Cung Le, Nathan Quarry, Jon Fitch, Luis Javier
Vazquez, Brandon Vera, and Kyle Kingsbury*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle Kingsbury
on behalf of themselves and all others similarly
situated,

Plaintiffs,
v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF ERIC L. CRAMER,
ESQ.**

1 I, Eric L. Cramer, Esq., declare and state as follows:

2 1. I am a managing shareholder of Berger Montague PC, one of the Court appointed Interim
3 Co-Lead Counsel for the proposed Classes and an attorney for Individual and Representative
4 Plaintiffs. I am a member in good standing of the State Bars of Pennsylvania and New York, and
5 have been admitted *pro hac vice* in this Court. I am over 18 years of age and have personal
6 knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify
7 competently to them.

8 2. I make this declaration in support of Plaintiffs' Opposition to Zuffa's Motion for
9 Summary Judgment.

10 3. Attached as Exhibit 1 is a true and correct copy of the Expert Report of Hal J. Singer,
11 Ph.D., dated August 31, 2017 (referred to in Plaintiffs' papers as "SR1").

12 4. Attached as Exhibit 2 is a true and correct copy of the Rebuttal Expert Report of Hal J.
13 Singer, Ph.D., dated January 12, 2018 (referred to in Plaintiffs' papers as "SR2").

14 5. Attached as Exhibit 3 is a true and correct copy of the Supplemental Expert Report of Hal
15 J. Singer, Ph.D., dated April 3, 2018 (referred to in Plaintiffs' papers as "SR3").

16 6. Attached as Exhibit 4 is a true and correct copy of the Second Supplemental Reply Report
17 of Hal J. Singer, Ph.D., dated May 28, 2018 (referred to in Plaintiffs' papers as "SR4").

18 7. Attached as Exhibit 5 is a true and correct copy of the Expert Report of Andrew Zimbalist
19 in *Cung Le, et al. v. Zuffa, LLC*, dated August 31, 2017 (referred to in Plaintiffs' papers as
20 "ZR1").

21 8. Attached as Exhibit 6 is a true and correct copy of the Expert Rebuttal Report of Andrew
22 Zimbalist, dated December 26, 2017 (referred to in Plaintiffs' papers as "ZR2").

23 9. Attached as Exhibit 7 is a true and correct copy of the Expert Rebuttal Report of Professor
24 Alan Manning, dated January 12, 2018 (referred to in Plaintiffs' papers as "MR1").

25 10. Attached as Exhibit 8 is a true and correct copy of the Expert Report of Guy A. Davis,
26 CPA, CIRA, CDBV, CFE, dated August 31, 2017 (referred to in Plaintiffs' papers as "GDR1").

27 11. Attached as Exhibit 9 is a true and correct copy of excerpts from the Expert Report of
28 Professor Robert H. Topel, dated October 27, 2017 (referred to in Plaintiffs' papers as "TR1").

12. Attached as Exhibit 10 is a true and correct copy of excerpts from the Expert Report of Paul Oyer, dated October 27, 2017 (referred to in Plaintiffs' papers as "OR1").

13. Attached as Exhibit 11 is a true and correct copy of excerpts from the deposition of Nathan Quarry, taken in this matter on September 30, 2016.

14. Attached as Exhibit 12 is a true and correct copy of excerpts from the first day of the 30(b)(6) deposition of Kirk D. Hendrick on behalf of Zuffa, LLC, taken in this matter on November 29-30, 2016.

15. Attached as Exhibit 13 is a true and correct copy of excerpts from the second day of the 30(b)(6) deposition of Kirk D. Hendrick on behalf of Zuffa, LLC, taken in this matter on November 29-30, 2016.

16. Attached as Exhibit 14 is a true and correct copy of excerpts from the 30(b)(6) deposition of Ike Lawrence Epstein on behalf of Zuffa, LLC, taken in this matter on December 2, 2016.

17. Attached as Exhibit 15 is a true and correct copy of excerpts from the deposition of Denitza Batchvarova, taken in this matter on January 25, 2017.

18. Attached as Exhibit 16 is a true and correct copy of excerpts from the deposition of Kurt Otto, taken in this matter on February 6, 2017.

19. Attached as Exhibit 17 is a true and correct copy of excerpts from the first day of the deposition of Thomas J. Atencio, taken in this matter on February 9-10, 2017.

20. Attached as Exhibit 18 is a true and correct copy of excerpts from the deposition of Jon Fitch, taken in this matter on February 15, 2017.

21. Attached as Exhibit 19 is a true and correct copy of excerpts from the deposition of Brandon Vera, taken in this matter on February 16, 2017.

22. Attached as Exhibit 20 is a true and correct copy of excerpts from the deposition of Kyle Kingsbury, taken in this matter on February 17, 2017.

23. Attached as Exhibit 21 is a true and correct copy of excerpts from the deposition of Jeremy Lappen, taken in this matter on February 28, 2017.

24. Attached as Exhibit 22 is a true and correct copy of excerpts from the deposition of Lorenzo J. Fertitta, taken in this matter on March 23, 2017.

25. Attached as Exhibit 23 is a true and correct copy of excerpts from the deposition of Shannon Knapp, taken in this matter on April 11, 2017.

26. Attached as Exhibit 24 is a true and correct copy of excerpts from the deposition of Sean Shelby, taken in this matter on April 12, 2017.

27. Attached as Exhibit 25 is a true and correct copy of excerpts from the deposition of John Mulkey, taken in this matter on April 19, 2017.

28. Attached as Exhibit 26 is a true and correct copy of excerpts from the deposition of Jeffrey Aronson, taken in this matter on April 25, 2017.

29. Attached as Exhibit 27 is a true and correct copy of excerpts from the 30(b)(6) deposition of Drew Goldman on behalf of Deutsche Bank, taken in this matter on April 28, 2017.

30. Attached as Exhibit 28 is a true and correct copy of excerpts from the deposition of Ike Lawrence Epstein, taken in this matter on May 26, 2017.

31. Attached as Exhibit 29 is a true and correct copy of excerpts from the deposition of Joseph Silva, taken in this matter on June 7, 2017.

32. Attached as Exhibit 30 is a true and correct copy of excerpts from the deposition of Scott Coker, taken in this matter on August 3, 2017.

33. Attached as Exhibit 31 is a true and correct copy of excerpts from Volume 1 of the first day of the deposition of Dana F. White, taken in this matter on August 9-10, 2017.

34. Attached as Exhibit 32 is a true and correct copy of excerpts from Volume 2 of the first day of the deposition of Dana F. White, taken in this matter on August 9-10, 2017.

35. Attached as Exhibit 33 is a true and correct copy of excerpts from the second day of the deposition of Dana F. White, taken in this matter on August 9-10, 2017.

36. Attached as Exhibit 34 is a true and correct copy of excerpts from the first deposition of Hal J. Singer, Ph.D., taken in this matter on September 27, 2017.

37. Attached as Exhibit 35 is a true and correct copy of excerpts from the deposition of Paul Oyer, taken in this matter on November 29, 2017.

38. Attached as Exhibit 36 is a true and correct copy of excerpts from the first day of the deposition of Robert Topel, taken in this matter on December 5-6, 2017.

1 39. Attached as Exhibit 37 is a true and correct copy of excerpts from the second day of the
2 deposition of Robert Topel, taken in this matter on December 5-6, 2017.

3 40. Attached as Exhibit 38 is a true and correct copy of excerpts from the first day of the
4 deposition of Roger D. Blair, taken in this matter on December 8-9, 2017.

5 41. Attached as Exhibit 39 is a true and correct copy of excerpts from the second day of the
6 deposition of Roger D. Blair, taken in this matter on December 8-9, 2017.

7 42. Attached as Exhibit 40 is a true and correct copy of a document bearing the Bates label
8 ZFL-0827903. This document was produced by Zuffa to Plaintiffs in discovery. This document is
9 a true and correct copy of a March 2014 email exchange between Joe Silva, Lorenzo Fertitta,
10 Dana White, and Lawrence Epstein.

11 43. Attached as Exhibit 41 is a true and correct copy of a document bearing the Bates label
12 ZFL-0872344 through ZFL-0872345. This document was produced by Zuffa to Plaintiffs in
13 discovery. This document is a true and correct copy of a January 15, 2015 email exchange
14 between Dan Farmer, Joe Silva, and Sean Shelby with an embedded email exchange between
15 Wallid Ismael and Joe Silva and an additional embedded email exchange between Jamie
16 Campione, Mayra De Leon, Dan Farmer, and Trevor Landolt.

17 44. Attached as Exhibit 42 is a true and correct copy of a document bearing the Bates label
18 ZFL-0872351 through ZFL-0872352. This document was produced by Zuffa to Plaintiffs in
19 discovery. This document is a true and correct copy of a January 15, 2015 email exchange
20 between Dan Farmer, Joe Silva, and Sean Shelby with an embedded email exchange between
21 Jamie Campione, Mayra De Leon, Dan Farmer, and Trevor Landolt.

22 45. Attached as Exhibit 43 is a true and correct copy of a document bearing the Bates label
23 ZFL-0990908. This document was produced by Zuffa to Plaintiffs in discovery. This document is
24 a true and correct copy of a May 29, 2014 email exchange between Lawrence Epstein, Michael
25 Mersch, and Kirk Hendrick.

26 46. Attached as Exhibit 44 is a true and correct copy of excerpts from a document bearing the
27 Bates label ZFL-1055607 through ZFL-1055621. This document was produced by Zuffa to
28 Plaintiffs in discovery. This document is a true and correct copy of a "Company Overview"

1 prepared by Zuffa and provided to Deutsche Bank Securities, Inc. on February 1, 2013 in
2 connection with a 2013 debt offering prospectus.

3 47. Attached as Exhibit 45 is a true and correct copy of a document bearing the Bates label
4 ZFL-1081154 through ZFL-1081158. This document was produced by Zuffa to Plaintiffs in
5 discovery. This document is a true and correct copy of a draft credit opinion prepared for Zuffa
6 by Moody's Investors Service, Inc. in January 2014 containing handwritten comments from Zuffa
7 CFO John Mulkey.

8 48. Attached as Exhibit 46 is a true and correct copy of a document bearing the Bates label
9 ZFL-1096310 through ZFL-1096311. This document was produced by Zuffa to Plaintiffs in
10 discovery. This document is a true and correct copy of an email from Doug Hartling from Jackie
11 Poriadjian with an embedded email exchange between Garry Cook, Jackie Poriadjian, Doug
12 Hartling, and John Mulkey and an additional embedded email exchange between John Mulkey,
13 Lorenzo Fertitta, Craig Borsari, Lawrence Epstein, Dana White, Marshall Zelaznik, Garry Cook,
14 Kirk Hendrick, and Nakisa Bidarian.

15 49. Attached as Exhibit 47 is a true and correct copy of a document bearing the Bates label
16 ZFL-1240584 through ZFL-1240591. This document was produced by Zuffa to Plaintiffs in
17 discovery. This document is a true and correct copy of a document titled Intangible Asset
18 Treatment Discussion Memo produced by Zuffa in or around April 2007.

19 50. Attached as Exhibit 48 is a true and correct copy of excerpts from a document bearing the
20 Bates label ZFL-1384297 through ZFL-1384315. This document was produced by Zuffa to
21 Plaintiffs in discovery. This document is a true and correct copy of a presentation titled
22 "Financing Discussion Materials" prepared for Zuffa by Goldman, Sachs & Co. on or about
23 August 3, 2012.

24 51. Attached as Exhibit 49 is a true and correct copy of a document bearing the Bates label
25 ZFL-1391183 through ZFL-1391187. This document was produced by Zuffa to Plaintiffs in
26 discovery. This document is a true and correct copy of a credit opinion prepared for Zuffa by
27 Moody's Investors Service, Inc. in December 2010.

52. Attached as Exhibit 50 is a true and correct copy of a document bearing the Bates label ZFL-1404974 through ZFL-1404978. This document was produced by Zuffa to Plaintiffs in discovery. This document is a true and correct copy of a November 17, 2011 email exchange between Joe Silva and Michael Mersch with an embedded email exchange between Lorenzo Fertitta and Joe Silva and an additional embedded email exchange between Joe Silva, Michael Mersch, and Michael Connette.

53. Attached as Exhibit 51 is a true and correct copy of a document bearing the Bates label ZFL-1421551. This document was produced by Zuffa to Plaintiffs in discovery. This document is a true and correct copy of an April 2010 email exchange between Lorenzo Fertitta, Joe Silva, and Dana White with an embedded email exchange between Joe Silva and Cesar Gracie.

54. Attached as Exhibit 52 is a true and correct copy of excerpts from a document bearing the Bates label ZFL-1472158 through ZFL-1472222. This document was produced by Zuffa to Plaintiffs in discovery. This document is a true and correct copy of the Responses of Zuffa, LLC to the Civil Investigative Demand Issued by the Federal Trade Commission on June 30, 2011.

55. Attached as Exhibit 53 is a true and correct copy of a document bearing the Bates label ZFL-1484034 through ZFL-1484037. This document was produced by Zuffa to Plaintiffs in discovery. This document is a true and correct copy of an August 1, 2013 email exchange between John Mulkey and Stephen Tecci and the three .pdf documents attached to the email.

56. Attached as Exhibit 54 is a true and correct copy of a document bearing the Bates label ZFL-1501599. This document was produced by Zuffa to Plaintiffs in discovery. This document is a true and correct copy of an October 21, 2011 email exchange between Mark Fischer, Marshall Zelaznik, and Sean Shelby with an embedded email exchange between Victor Cui and Mark Fischer.

57. Attached as Exhibit 55 is a true and correct copy of a document bearing the Bates label ZFL-1872579. This document was produced by Zuffa to Plaintiffs in discovery. This document is a true and correct copy of a February 25, 2014 text message from Lorenzo Fertitta to Dana White.

1 58. Attached as Exhibit 56 is a true and correct copy of a document bearing the Bates label
2 ZFL-1873428. This document was produced by Zuffa to Plaintiffs in discovery. This document is
3 a true and correct copy of a September 4, 2014 text message from Audie Attar to Lorenzo Fertitta.

4 59. Attached as Exhibit 57 is a true and correct copy of a document bearing the Bates label
5 ZFL-1874637. This document was produced by Zuffa to Plaintiffs in discovery. This document is
6 a true and correct copy of a May 10, 2013 text message from Joe Silva to Lorenzo Fertitta.

7 60. Attached as Exhibit 58 is a true and correct copy of excerpts from a document bearing the
8 Bates label ZFL-1897652 through ZFL-1897829. This document was produced by Zuffa to
9 Plaintiffs in discovery. This document is a true and correct copy of a compilation containing text
10 messages from the phone of Lorenzo Fertitta.

11 61. Attached as Exhibit 59 is a true and correct copy of a document bearing the Bates label
12 ZFL-1904802 through ZFL-1904803. This document was produced by Zuffa to Plaintiffs in
13 discovery. This document is a true and correct copy of an October 9, 2012 email from Michael
14 Mersch to Dave Sholler with an embedded email exchange between Dave Sholler, Kirk Hendrick,
15 Michael Mersch, and Jackie Poriadjian and an additional embedded email exchange between
16 Michael Chiappetta and Anthony Evans.

17 62. Attached as Exhibit 60 is a true and correct copy of a document bearing the Bates label
18 ZFL-1911498. This document was produced by Zuffa to Plaintiffs in discovery. This document is
19 a true and correct copy of a July 2, 2009 email exchange between John Mulkey, Lawrence
20 Epstein, and Kirk Hendrick with an embedded email exchange between Sean Shelby, Joe Silva,
21 John Mulkey, and Dana White.

22 63. Attached as Exhibit 61 is a true and correct copy of a document bearing the Bates label
23 ZFL-2020850 through ZFL-2020858. This document was produced by Zuffa to Plaintiffs in
24 discovery. This document is a true and correct copy of a July 23, 2009 Confidential Agreement
25 between Affliction Entertainment Group, LLC and Zuffa, LLC.

26 64. Attached as Exhibit 62 is a true and correct copy of a document bearing the Bates label
27 ZFL-2193553. This document was produced by Zuffa to Plaintiffs in discovery. This document is
28 a true and correct copy of a July 2009 email exchange between Michael Mersch and Kevin

1 Mulvey with an embedded email exchange between Michael Mersch, Kevin Mulvey, and Joseph
2 Ricca.

3 65. Attached as Exhibit 63 is a true and correct copy of excerpts from a document bearing the
4 Bates label ZFL-2277058 through ZFL-2277088. This document was produced by Zuffa to
5 Plaintiffs in discovery. This document is a true and correct copy of a presentation titled "Q4 2010
6 Zuffa Financial Review."

7 66. Attached as Exhibit 64 is a true and correct copy of excerpts from a document bearing the
8 Bates label ZFL-2279086 through ZFL-2279100. This document was produced by Zuffa to
9 Plaintiffs in discovery. This document is a true and correct copy of a September 2, 2009 lender
10 presentation prepared by Zuffa.

11 67. Attached as Exhibit 65 is a true and correct copy of a document bearing the Bates label
12 ZFL-2283306 through ZFL-2283314. This document was produced by Zuffa to Plaintiffs in
13 discovery. This document is a true and correct copy of a document titled Intangible Asset
14 Treatment Discussion Memo produced by Zuffa in or around March 2007.

15 68. Attached as Exhibit 66 is a true and correct copy of a document bearing the Bates label
16 ZFL-2461790. This document was produced by Zuffa to Plaintiffs in discovery. This document is
17 a true and correct copy of a December 7, 2009 email from Scott Coker to Shannon Knapp, Jordan
18 Feagan, Jerry Millin, Javier Mendez, Andrew Ebel, David Dinkins, Jock McLain, James Mormile,
19 and Mike Afromowitz with an embedded email exchange between Rich Chou, Scott Coker, and
20 Bob Cook.

21 69. Attached as Exhibit 67 is a true and correct copy of excerpts from a document bearing the
22 Bates label ZFL-2463304. This document was produced by Zuffa to Plaintiffs in discovery. This
23 document is a true and correct copy of a draft Confidential Information Memorandum prepared
24 by Inner Circle Sports LLC in or around March 2010 on behalf of Strikeforce in connection with
25 a possible equity investment in Strikeforce.

26 70. Attached as Exhibit 68 is a true and correct copy of a document bearing the Bates label
27 ZFL-2469204 through ZFL-2469205. This document was produced by Zuffa to Plaintiffs in
28 discovery. This document is a true and correct copy of a July 2009 email exchange between Scott

1 Coker and Shannon Knapp with an embedded email exchange between Todd Beard, Chris Lisk,
 2 Bruce Binkow, Tom Atencio, Eric Foss, Clifton Chason, Larry Beard, Donald Trump Jr., Pamela
 3 Rogers, Bob Trieger, Tracy Hess, Courtney Dubar, Gary Brody, Jeff Brody, Rob Otto, Roy
 4 Englebrecht, Fedor Emelianenko, Steven Bash, Mike Bassiri, and Joost Raimond.

5 71. Attached as Exhibit 69 is a true and correct copy of a document bearing the Bates label
 6 ZFL-2469208 through ZFL-2469209. This document was produced by Zuffa to Plaintiffs in
 7 discovery. This document is a true and correct copy of a July 2009 email exchange between Scott
 8 Coker and Shannon Knapp with an embedded email exchange between Todd Beard, Chris Lisk,
 9 Bruce Binkow, Tom Atencio, Eric Foss, Clifton Chason, Larry Beard, Donald Trump Jr., Pamela
 10 Rogers, Bob Trieger, Tracy Hess, Courtney Dubar, Gary Brody, Jeff Brody, Rob Otto, Roy
 11 Englebrecht, Fedor Emelianenko, Steven Bash, Mike Bassiri, and Joost Raimond.

12 72. Attached as Exhibit 70 is a true and correct copy of a document bearing the Bates label
 13 ZFL-2477398 through ZFL-2477400. This document was produced by Zuffa to Plaintiffs in
 14 discovery. This document is a true and correct copy of a June 2013 email exchange between
 15 Lawrence Epstein and Jackie Poriadjian with an embedded email exchange between Lawrence
 16 Epstein and Lorenzo Fertitta and an additional embedded email exchange between Doug Hartling,
 17 Lawrence Epstein, Jackie Poriadjian, Kirk Hendrick, John Mulkey, Tara Connell, Brandon Clark,
 18 and Rich Hollis.

19 73. Attached as Exhibit 71 is a true and correct copy of a document bearing the Bates label
 20 ZFL-2496215 through ZFL-2496216. This document was produced by Zuffa to Plaintiffs in
 21 discovery. This document is a true and correct copy of a July 2012 email exchange between Joe
 22 Silva, Michael Mersch, and Tracy Long with an embedded email exchange between Joe Silva,
 23 Heidi Noland, Beth Turnbull, Brad Smuckler, Chris Kartzmark, Craig Borsari, Dana White, Gina
 24 Paglione, Jackie Poriadjian, Jaime Pollack, John Mulkey, Kirk Hendrick, Laura Gilbert,
 25 Lawrence Epstein, Lorenzo Fertitta, Marshal Zelaznik, Michael Mersch, UFC Public Relations,
 26 Peter Dropick, Sean Shelby, Tim O'Toole, Tom Wright, Tracy Long, Donna Marcolini, Tom
 27 Gerbasi, Dana White, and Zachary Candito.

1 74. Attached as Exhibit 72 is a true and correct copy of a document bearing the Bates label
2 ZFL-2497585 through ZFL-2497587. This document was produced by Zuffa to Plaintiffs in
3 discovery. This document is a true and correct copy of a July 31, 2014 email exchange between
4 Joe Silva, Sean Shelby, and Tracy Long.

5 75. Attached as Exhibit 73 is a true and correct copy of a document bearing the Bates label
6 ZFL-2528642 through ZFL-2528643. This document was produced by Zuffa to Plaintiffs in
7 discovery. This document is a true and correct copy of a March 24, 2015 email from Jackie
8 Poriadjian to Garry Cook with an embedded email exchange between Garry Cook, Jackie
9 Poriadjian, Doug Hartling, and John Mulkey, and an additional embedded email exchange
10 between John Mulkey, Lorenzo Fertitta, Craig Borsari, Lawrence Epstein, Dana White, Marshall
11 Zelaznik, Garry Cook, Kirk Hendrick and Nakisa Bidarian.

12 76. Attached as Exhibit 74 is a true and correct copy of a document bearing the Bates label
13 ZFL-2528842 through ZFL-2528844. This document was produced by Zuffa to Plaintiffs in
14 discovery. This document is a true and correct copy of a May 10, 2012 email exchange between
15 Marc Ratner and Tara Connell with an embedded email exchange between John Mulkey and Tara
16 Connell and an additional embedded email exchange between Caren Bell, Dana White, Lorenzo
17 Fertitta, Kirk Hendrick, Lawrence Epstein, Bryan Johnston, John Mulkey and Craig Borsari.

18 77. Attached as Exhibit 75 is a true and correct copy of a document bearing the Bates label
19 ZFL-2535654 through ZFL-2535655. This document was produced by Zuffa to Plaintiffs in
20 discovery. This document is a true and correct copy of a December 30, 2012 email exchange
21 between Sean Shelby, Tracy Long, Joe Silva, and Michael Mersch with an embedded email
22 exchange between Tracy Long and Sean Shelby and an additional embedded email exchange
23 between Sean Shelby, Joe Silva, Heidi Noland, Beth Turnbull, Chris Kartzmark, Craig Borsari,
24 Dana White, Donna Marcolini, Jennifer Wenk, John Mulkey, Kirk Hendrick, Lorenzo Fertitta,
25 Marshall Zelaznik, Tom Gerbasi, Tim O'Toole, Gina Paglione, Lawrence Epstein, Michael
26 Mersch, and Tracy Long.

27 78. Attached as Exhibit 76 is a true and correct copy of a document bearing the Bates label
28 ZFL-2536695. This document was produced by Zuffa to Plaintiffs in discovery. This document is

1 a true and correct copy of an August 2, 2013 email from Tracy Long to Joe Silva and Michael
2 Mersch.

3 79. Attached as Exhibit 77 is a true and correct copy of a document bearing the Bates label
4 ZFL-2544572 through ZFL-2544573. This document was produced by Zuffa to Plaintiffs in
5 discovery. This document is a true and correct copy of an April 2, 2015 email exchange between
6 Joe Silva, Lorenzo Fertitta, Dana White, and Lawrence Epstein with an embedded email
7 exchange between Joe Silva, Bob Cook, and Reed Harris, and an additional embedded email
8 exchange between Richard Chou and Bob Cook.

9 80. Attached as Exhibit 78 is a true and correct copy of excerpts from a document bearing the
10 Bates label ZFL-2700585. This document was produced by Zuffa to Plaintiffs in discovery. This
11 document is a true and correct copy of a September 3, 2014 presentation titled "Fighter Pay
12 Assessment Summary Market Analysis" prepared for Zuffa by the firm, Mercer.

13 81. Attached as Exhibit 79 is a true and correct copy of a document bearing the Bates label
14 ZFL-2757165 through ZFL-2757166. This document was produced by Zuffa to Plaintiffs in
15 discovery. This document is a true and correct copy of an October 11, 2012 email exchange
16 between Tracy Long and Michael Mersch with an embedded email exchange between Tracy
17 Long, Michael Mersch, and jdt@lawgm.com.

18 82. Attached as Exhibit 80 is a true and correct copy of a document bearing the Bates label
19 ZFL-2764805. This document was produced by Zuffa to Plaintiffs in discovery. This document is
20 a true and correct copy of a September 29, 2008 email from Kirk Hendrick to Lorenzo Fertitta,
21 Dana White, Lawrence Epstein, and John Mulkey.

22 83. Attached as Exhibit 81 is a true and correct copy of a document bearing the Bates label
23 ZFL-12535916 through ZFL-12535917. This document was produced by Zuffa to Plaintiffs in
24 discovery. This document is a true and correct copy of a November 13, 2013 email exchange
25 between Kirk Hendrick and John Mulkey with an embedded email exchange between Denitza
26 Batchvarova, Kirk Hendrick, Sean Shelby, Lawrence Epstein, Michael Mersch, Nakisa Bidarian,
27 Tim Bellamy, and John Mulkey and an additional embedded email exchange between Sean
28 Shelby, Denitza Batchvarova, Lawrence Epstein, Michael Mersch, and Nakisa Bidarian.

1 84. Attached as Exhibit 82 is a true and correct copy of a document bearing the Bates label
2 ZFL-12543287 through ZFL-12543293. This document was produced by Zuffa to Plaintiffs in
3 discovery. This document is a true and correct copy of a draft credit opinion prepared for Zuffa
4 by Moody's Investors Service, Inc. in January 2014.

5 85. Attached as Exhibit 83 is a true and correct copy of a document bearing the Bates label
6 ZUF-00031544 through ZUF-00031545. This document was produced by Zuffa to Plaintiffs in
7 discovery. This document is a true and correct copy of a January 31, 2007 email from Thomas
8 Paschall to Lorenzo Fertitta, Frank Fertitta, Kirk Hendrick, Dana White, Kenneth Baronsky,
9 Pamela Neufeld, and John Mulkey.

10 86. Attached as Exhibit 84 is a true and correct copy of a document bearing the Bates label
11 ZUF-00085896 through ZUF-00085901. This document was produced by Zuffa to Plaintiffs in
12 discovery. This document is a true and correct copy of a February 12, 2011 email from Joe Silva
13 to Dana White, Lorenzo Fertitta, and Sean Shelby.

14 87. Attached as Exhibit 85 is a true and correct copy of excerpts from a document bearing the
15 Bates label ZUF-00108798 through ZUF-00108885. This document was produced by Zuffa to
16 Plaintiffs in discovery. This document is a true and correct copy of a September 14, 2010
17 Transfer Pricing Analysis and Report for fiscal year ended December 31, 2009 prepared for Zuffa
18 by PricewaterhouseCoopers.

19 88. Attached as Exhibit 86 is a true and correct copy of excerpts from a document bearing the
20 Bates label ZUF-00111415. This document was produced by Zuffa to Plaintiffs in discovery. This
21 document is a true and correct copy of a Confidential Information Memorandum prepared for
22 Zuffa by Deutsche Bank Securities, Inc. in October 2009.

23 89. Attached as Exhibit 87 is a true and correct copy of a document bearing the Bates label
24 ZUF-00154095. This document was produced by Zuffa to Plaintiffs in discovery. This document
25 is a true and correct copy of a February 2009 email exchange between Kirk Hendrick and Chad
26 Hurley.

27 90. Attached as Exhibit 88 is a true and correct copy of excerpts from a document bearing the
28 Bates label ZUF-00162329 through ZUF-00162382. This document was produced by Zuffa to

1 Plaintiffs in discovery. This document is a true and correct copy of a draft Confidential
2 Information Memorandum prepared for Zuffa by Deutsche Bank Securities, Inc. in October 2009.

3 91. Attached as Exhibit 89 is a true and correct copy of a document bearing the Bates label
4 ZUF-00284193 through ZUF-00284196. This document was produced by Zuffa to Plaintiffs in
5 discovery. This document is a true and correct copy of an article titled "The Twitter Q&A: Dana
6 White for the Fans by the Fans" from the October-November 2010 UFC Magazine.

7 92. Attached as Exhibit 90 is a true and correct copy of a document bearing the Bates label
8 ZUF-00296965 through ZUF-00296971. This document was produced by Zuffa to Plaintiffs in
9 discovery. This document is a true and correct copy of a 2010 email exchange between Joe Silva
10 and Nima Safapour.

11 93. Attached as Exhibit 91 is a true and correct copy of a document bearing the Bates label
12 ZUF-00325418 through ZUF-00325419. This document was produced by Zuffa to Plaintiffs in
13 discovery. This document is a true and correct copy of a January 3, 2011 email from Joe Silva to
14 Dana White, Lorenzo Fertitta, Brad Smuckler, and John Mulkey.

15 94. Attached as Exhibit 92 is a true and correct copy of a document bearing the Bates label
16 ZUF-00336384 through ZUF-00336388. This document was produced by Zuffa to Plaintiffs in
17 discovery. This document is a true and correct copy of a credit opinion prepared for Zuffa by
18 Moody's Investors Service, Inc. in November 2009.

19 95. Attached as Exhibit 93 is a true and correct copy of a document bearing the Bates label
20 ZUF-00395941 through ZUF-00395942. This document was produced by Zuffa to Plaintiffs in
21 discovery. This document is a true and correct copy of a credit opinion prepared for Zuffa by
22 Moody's Investors Service, Inc. in November 2009.

23 96. Attached as Exhibit 94 is a true and correct copy of a document bearing the Bates label
24 ZUF-00395952 through ZUF-00395953. This document was produced by Zuffa to Plaintiffs in
25 discovery. This document is a true and correct copy of a May 13, 2010 email exchange between
26 Edward Muncey and Jenifer Wenk.

27 97. Attached as Exhibit 95 is a true and correct copy of excerpts from a document bearing the
28 Bates label CG-UFC-00000005. This document was produced in native excel format by The

1 Carlyle Group to Plaintiffs in discovery. This document is a true and correct copy of a diligence
2 tracking spreadsheet dated June 15, 2016 prepared for Zuffa by The Raine Group.

3 98. Attached as Exhibit 96 is a true and correct copy of excerpts from a document bearing the
4 Bates label DB-ZUFFA-00006237 through DB-ZUFFA-00006313. This document was produced
5 by Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct
6 copy of a Confidential Information Memorandum prepared for Zuffa by Deutsche Bank in
7 February 2013.

8 99. Attached as Exhibit 97 is a true and correct copy of excerpts from a document bearing the
9 Bates label DB-ZUFFA-00006389 through DB-ZUFFA-00006457. This document was produced
10 by Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct
11 copy of a Leveraged Finance Credit Report concerning Zuffa prepared by Deutsche Bank in
12 January 2013.

13 100. Attached as Exhibit 98 is a true and correct copy of excerpts from a document bearing the
14 Bates label DB-ZUFFA-00006528 through DB-ZUFFA-00006539. This document was produced
15 by Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct
16 copy of a draft Loan Screening Committee Memorandum prepared for Zuffa by Deutsche Bank in
17 August 2011.

18 101. Attached as Exhibit 99 is a true and correct copy of excerpts from a document bearing the
19 Bates label DB-ZUFFA-00006631 through DB-ZUFFA-00006675. This document was produced
20 by Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct
21 copy of a May 23, 2007 lender's presentation prepared for Zuffa by Deutsche Bank.

22 102. Attached as Exhibit 100 is a true and correct copy of excerpts from a document bearing
23 the Bates label DB-ZUFFA-00006712 through DB-ZUFFA-00006786. This document was
24 produced by Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and
25 correct copy of a Confidential Information Memorandum prepared for Zuffa by Deutsche Bank in
26 May 2007.

27 103. Attached as Exhibit 101 is a true and correct copy of excerpts from a document bearing
28 the Bates label DB-ZUFFA-00014046 through DB-ZUFFA-00014120. This document was

1 produced by Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and
2 correct copy of a Confidential Information Memorandum prepared for Zuffa by Deutsche Bank in
3 May 2007.

4 104. Attached as Exhibit 102 is a true and correct copy of a document bearing the Bates label
5 DB-ZUFFA-00020303 through DB-ZUFFA-00020306. This document was produced by
6 Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct copy
7 of a draft Frequently Asked Questions document concerning Zuffa prepared by Deutsche Bank in
8 or around May 2007.

9 105. Attached as Exhibit 103 is a true and correct copy of excerpts from a document bearing
10 the Bates label DB-ZUFFA-00024678 through DB-ZUFFA-00024706. This document was
11 produced by Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and
12 correct copy of an October 2009 public lender's presentation prepared for Zuffa by Deutsche
13 Bank.

14 106. Attached as Exhibit 104 is a true and correct copy of excerpts from a document bearing
15 the Bates label DB-ZUFFA-00056900 through DB-ZUFFA-00056954. This document was
16 produced by Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and
17 correct copy of a Confidential Information Memorandum prepared for Zuffa by Deutsche Bank in
18 October 2009.

19 107. Attached as Exhibit 105 is a true and correct copy of excerpts from a document bearing
20 the Bates label DB-ZUFFA-00057908 through DB-ZUFFA-00057968. This document was
21 produced by Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and
22 correct copy of a Leveraged Finance Credit Report concerning Zuffa prepared by Deutsche Bank
23 in January 2013.

24 108. Attached as Exhibit 106 is a true and correct copy of a document bearing the Bates label
25 MDYS ZFF 000005 through MDYS ZFF 000009. This document was produced by Moody's
26 Investors Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a
27 credit opinion prepared for Zuffa by Moody's Investors Service, Inc. in November 2008.

1 109. Attached as Exhibit 107 is a true and correct copy of a document bearing the Bates label
2 MDYS ZFF 000039 through MDYS ZFF 000045. This document was produced by Moody's
3 Investors Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a
4 credit opinion prepared for Zuffa by Moody's Investors Service, Inc. in December 2011.

5 110. Attached as Exhibit 108 is a true and correct copy of a document bearing the Bates label
6 MDYS ZFF 000058 through MDYS ZFF 000063. This document was produced by Moody's
7 Investors Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a
8 credit opinion prepared for Zuffa by Moody's Investors Service, Inc. in February 2013.

9 111. Attached as Exhibit 109 is a true and correct copy of a document bearing the Bates label
10 MDYS ZFF 000074 through MDYS ZFF 000081. This document was produced by Moody's
11 Investors Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a
12 credit opinion prepared for Zuffa by Moody's Investors Service, Inc. in February 2015.

13 112. Attached as Exhibit 110 is a true and correct copy of a document bearing the Bates label
14 MDYS ZFF 000082 through MDYS ZFF 000087. This document was produced by Moody's
15 Investors Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a
16 credit opinion prepared for Zuffa by Moody's Investors Service, Inc. in February 2016.

17 113. Attached as Exhibit 111 is a true and correct copy of excerpts from a document bearing
18 the Bates label MDYS ZFF 000103 through MDYS ZFF 000156. This document was produced
19 by Moody's Investors Service, Inc. to Plaintiffs in discovery. This document is a true and correct
20 copy of a May 9, 2007 presentation to Moody's titled "Ultimate Fighting Championship."

21 114. Attached as Exhibit 112 is a true and correct copy of excerpts from a document bearing
22 the Bates label RAINE0000019 through RAINE0000088. This document was produced by The
23 Raine Group, LLC to Plaintiffs in discovery. This document is a true and correct copy of a
24 January 2013 lender presentation prepared for Zuffa by The Raine Group and Banco Itaú BBA
25 S.A.

26 115. Attached as Exhibit 113 is a true and correct copy of excerpts from a document bearing
27 the Bates label RAINE0018791 through RAINE0018809. This document was produced by The
28

1 Raine Group, LLC to Plaintiffs in discovery. This document is a true and correct copy of a March
2 31, 2016 document titled "Follow-up Question List from CMC."

3 116. Attached as Exhibit 114 is a true and correct copy of excerpts from a document bearing
4 the Bates label RAINE0020542. This document was produced in native excel format by The
5 Raine Group, LLC to Plaintiffs in discovery. This document is a true and correct copy of a
6 diligence tracking spreadsheet dated March 29, 2016 prepared for Zuffa by the Raine Group.

7 117. Attached as Exhibit 115 is a true and correct copy of excerpts from a document bearing
8 the Bates label RAINE0020633. This document was produced in native excel format by The
9 Raine Group, LLC to Plaintiffs in discovery. This document is a true and correct copy of a
10 diligence tracking spreadsheet dated June 15, 2016 prepared for Zuffa by The Raine Group.

11 118. Attached as Exhibit 116 is a true and correct copy of excerpts from a document bearing
12 the Bates label WME_ZUFFA_00001150. This document was produced by WME-IMG to
13 Plaintiffs in discovery. This document is a true and correct copy of a WME-IMG presentation
14 titled "Project Basquiat Final Posting Memo," dated June 12, 2016.

15 119. Attached as Exhibit 117 is a true and correct copy of excerpts from a document bearing
16 the Bates label WME_ZUFFA_00005368. This document was produced in native excel format by
17 WME-IMG to Plaintiffs in discovery. This document is a true and correct copy of an excel
18 spreadsheet titled "athlete comparison data v_02.xlsx" prepared in May 2016 by WME-IMG.

19 120. Attached as Exhibit 118 is a true and correct copy of a document bearing the Bates label
20 WME_ZUFFA_00013978 through WME_ZUFFA_00013979. This document was produced by
21 WME-IMG to Plaintiffs in discovery. This document is a true and correct copy of a March 20,
22 2016 email from Brent Richard to Ali Pfitzenmaier with an embedded email from Brent Richard
23 to himself.

24 121. Attached as Exhibit 119 is a true and correct copy of a document bearing the Bates label
25 WME_ZUFFA_00031950 through WME_ZUFFA_00031960. This document was produced by
26 WME-IMG to Plaintiffs in discovery. This document is a true and correct copy of an October 6,
27 2014 email exchange between Lenée Breckenridge and Brad Slater.

1 122. Attached as Exhibit 120 is a true and correct copy of excerpts from a document bearing
2 the Bates label Z.E._006755 through Z.E._007434. This document was produced by Zinkin
3 Entertainment & Sports Management to Plaintiffs in discovery. This document is a true and
4 correct copy of an April 2006 email exchange between Joe Silva and Bob Cook.

5 123. Attached as Exhibit 121 is a true and correct copy of Exhibit 6 from the deposition of
6 Jeffrey Aronson, taken in this matter on April 25, 2017. The underlying document is a true and
7 correct copy of a printout containing a February 24, 2014 article from Bloody Elbow titled "Titan
8 FC Owner Jeff Aronson talks unique bonus structure & contracts" authored by Iain Kidd.

9 124. Attached as Exhibit 122 is a true and correct copy of excerpts from Exhibit 2 from the
10 30(b)(6) deposition of Kirk D. Hendrick, taken in this matter on November 29-30, 2016. The
11 underlying document is part of a binder produced by Zuffa to Plaintiffs, containing written
12 descriptions and representative documents responsive to Plaintiffs' list of 30(b)(6) topics.

13 125. Attached as Exhibit 123 is a true and correct copy of Exhibit 24 from the 30(b)(6)
14 deposition of Kirk D. Hendrick, taken in this matter on November 29-30, 2016. The underlying
15 document bears the Bates label ZFL-2642993 through ZFL-2642994. This document was
16 produced by Zuffa to Plaintiffs in discovery and is a true and correct copy of a January 27, 2008
17 email from Joe Silva to Lawrence Epstein, Kirk Hendrick, Dana White, and Michael Mersch with
18 an embedded email from Leo Khorolinsky to Joe Silva.

19 126. Attached as Exhibit 124 is a true and correct copy of Exhibit 8 from the deposition of
20 Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the Bates label
21 ZUF-00296713 through ZUF-00296717. This document was produced by Zuffa to Plaintiffs in
22 discovery and is a true and correct copy of 2011 email exchange between Joe Silva and Greg
23 Kalikas.

24 127. Attached as Exhibit 125 is a true and correct copy of Exhibit 11 from the deposition of
25 Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the Bates label
26 ZFL-0822197 through ZFL-0822200. This document was produced by Zuffa to Plaintiffs in
27 discovery and is a true and correct copy of September-October 2014 email exchange between Joe
28 Silva, Kevin Patrick, and Patrick Walsh.

1 128. Attached as Exhibit 126 is a true and correct copy of Exhibit 12 from the deposition of
2 Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the Bates label
3 ZUF-00085896 through ZUF-00085901. This document was produced by Zuffa to Plaintiffs in
4 discovery and is a true and correct copy of a February 12, 2011 email from Joe Silva to Dana
5 White, Lorenzo Fertitta, and Sean Shelby.

6 129. Attached as Exhibit 127 is a true and correct copy of Exhibit 14 from the deposition of
7 Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the Bates label
8 ZFL-0826818 through ZFL-0826819. This document was produced by Zuffa to Plaintiffs in
9 discovery and is a true and correct copy of an October 2014 email exchange between Joe Silva,
10 Sean Shelby, Dana White, and Lorenzo Fertitta with an embedded email exchange between
11 Andrea Fabrizio, Joe Silva, and Sean Shelby.

12 130. Attached as Exhibit 128 is a true and correct copy of Exhibit 16 from the deposition of
13 Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the Bates label
14 ZFL-1012702. This document was produced by Zuffa to Plaintiffs in discovery and is a true and
15 correct copy of a December 26, 2012 email from Joe Silva to Lorenzo Fertitta and Dana White.

16 131. Attached as Exhibit 129 is a true and correct copy of Exhibit 26 from the deposition of
17 Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the Bates label
18 ZFL-2287140 through ZFL-2287144. This document was produced by Zuffa to Plaintiffs in
19 discovery and is a true and correct copy of 2009 email exchange between Joe Silva and Wad
20 Alameddine.

21 132. Attached as Exhibit 130 is a true and correct copy of Exhibit 28 from the deposition of
22 Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the Bates label
23 ZFL-0827903 and is a true and correct copy of a March 2014 email exchange between Lorenzo
24 Fertitta, Joe Silva, Dana White, and Lawrence Epstein.

25 133. Attached as Exhibit 131 is a true and correct copy of Exhibit 29 from the deposition of
26 Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the Bates label
27 ZFL-2497582 through ZFL-2497584 and is a true and correct copy of July 31, 2014 email
28 exchange between Tracy Long, Joe Silva, and Sean Shelby.

1 134. Attached as Exhibit 132 is a true and correct copy of Exhibit 39 from the deposition of
2 Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the Bates label
3 ZFL-0977248 and is a true and correct copy of a May 5, 2015 email exchange between Joe Silva
4 and Ryan Parsons.

5 135. Attached as Exhibit 133 is a true and correct copy of Exhibit 45 from the deposition of
6 Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the Bates label
7 ZFL-2536288 through ZFL-2536289 and is a true and correct copy of a June 19, 2012 email from
8 Tracy Long to Michael Mersch with an embedded email exchange between Matt Wiman and
9 Tracy Long.

10 136. Attached as Exhibit 134 is a true and correct copy of excerpts from Exhibit 3 from the
11 30(b)(6) deposition of Jeff Quinn, Zuffa's custodian of records, taken in this matter on July 27,
12 2017. The underlying document bears the Bates label ZFL-2699678. This document was
13 produced by Zuffa to Plaintiffs in discovery in native excel format and is a true and correct copy
14 of a spreadsheet containing text messages from the phone of Lorenzo Fertitta. To create the
15 exhibit, Plaintiffs sorted the text messages chronologically and added a column with row
16 numbers.

17 137. Attached as Exhibit 135 is a true and correct copy of Exhibit 36 from the deposition of
18 Dana F. White, taken in this matter on August 9-10, 2017. The underlying document is a true and
19 correct copy of a printout from Dana White's Twitter account, containing an October 14, 2012
20 Twitter post.

21 138. Attached as Exhibit 136 is a true and correct copy of Exhibit 44 from the deposition of
22 Dana F. White, taken in this matter on August 9-10, 2017. The underlying document is a true and
23 correct copy of a printout containing a July 6, 2007 article from ESPN.com titled "White not
24 worried about the competition" authored by Ryan Hockensmith.

25 139. Attached as Exhibit 137 is a true and correct copy of excerpts from Exhibit 117 from the
26 deposition of Dana F. White, taken in this matter on August 9-10, 2017. The underlying
27 document bears the Bates label ZFL-0000221 through ZFL-0000255. This document was
28

1 produced by Zuffa to Plaintiffs in discovery and is a true and correct copy of Zuffa's combined
2 financial statements for the years ended December 31, 2013 and 2012.

3 140. Attached as Exhibit 138 is a true and correct copy of excerpts from Defendant Zuffa,
4 LLC's Responses to Plaintiffs' Second, Third, and Fourth Set of Requests for Admission, dated
5 May 8, 2017.

6 141. Attached as Exhibit 139 is a true and correct copy of a printout containing a June 14, 2010
7 article from MMAJunkie.com titled "Dana White stands by 'pay for rankings' claim, says UFC is
8 the NFL of MMA" authored by John Morgan. This page can be accessed at
9 [http://mmajunkie.com/2010/06/dana-white-stands-by-pay-for-rankings-claim-says-ufc-is-the-nfl-](http://mmajunkie.com/2010/06/dana-white-stands-by-pay-for-rankings-claim-says-ufc-is-the-nfl-of-mixed-martial-arts)
10 [of-mixed-martial-arts](http://mmajunkie.com/2010/06/dana-white-stands-by-pay-for-rankings-claim-says-ufc-is-the-nfl-of-mixed-martial-arts), last accessed September 20, 2018.

11 142. Attached as Exhibit 140 is a true and correct copy of a printout containing a July 30, 2018
12 article from MMAFighting.com titled "ACB confirms cancellation of three events due to
13 'organizational and financial problems'" authored by Peter Carroll. This page can be accessed at
14 [https://www.mmafighting.com/2018/7/30/17629554/acb-confirms-cancellation-of-three-events-](https://www.mmafighting.com/2018/7/30/17629554/acb-confirms-cancellation-of-three-events-due-to-organizational-and-financial-problems)
15 [due-to-organizational-and-financial-problems](https://www.mmafighting.com/2018/7/30/17629554/acb-confirms-cancellation-of-three-events-due-to-organizational-and-financial-problems), last accessed September 13, 2018.

16 143. Attached as Exhibit 141 is a true and correct copy of excerpts from the second deposition
17 of Hal J. Singer, Ph.D., taken in this matter on January 23, 2018.

18
19 I declare under penalty of perjury and the laws of the United States that the foregoing is
20 true and correct. This Declaration was executed in Philadelphia, Pennsylvania on September 21,
21 2018.

22
23 /s/ Eric L. Cramer

24 Eric L. Cramer
25
26
27
28